

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x
:
UNITED STATES OF AMERICA :
:
- v. - :
:
ABDUL BASIT MOOSANI, :
:
Defendant. :
:
- - - - - x

SEALED
SUPERSEDING
INDICTMENT

S2 18 Cr. 274

COUNT ONE
(Conspiracy to Commit Money Laundering)

The Grand Jury charges:

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| USDC SDNY DOCUMENT ELECTRONICALLY FILE DOC #: DATE FILED MAY 22 2020 |
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1. From at least in or about 2014, up to and including in or about 2017, in the Southern District of New York, the United Arab Emirates, and elsewhere, in an offense begun and committed outside of the jurisdiction of any particular State or district of the United States, ABDUL BASIT MOOSANI, the defendant, and others known and unknown, at least one of whom is expected to be arrested in and first brought to the Southern District of New York, knowingly combined, conspired, confederated, and agreed together and with each other to launder money, in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1956(a)(2)(B)(i).

2. It was a part and an object of the conspiracy that ABDUL BASIT MOOSANI, the defendant, and others known and unknown, knowing that the property involved in a financial

transaction represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such a financial transaction which in fact involved the proceeds of specified unlawful activity, to wit, illegal narcotics trafficking and money laundering, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

3. It was further a part and an object of the conspiracy that ABDUL BASIT MOOSANI, the defendant, and others known and unknown, would and did transport, transmit, and transfer, and attempt to transport, transmit, and transfer, a monetary instrument and funds from a place in the United States to and through a place outside the United States, and to a place in the United States from and through a place outside the United States, knowing that the monetary instrument and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, to wit, illegal

narcotics trafficking and money laundering, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i)

(Title 18, United States Code, Sections 1956(h) and 3238.)

COUNT TWO

(Conspiracy to Commit Money Laundering)

The Grand Jury further charges:

4. From at least in or about 2016, up to and including in or about 2017, in the Southern District of New York, Australia, the United Arab Emirates, France, and elsewhere, in an offense begun and committed outside of the jurisdiction of any particular State or district of the United States, ABDUL BASIT MOOSANI, the defendant, and others known and unknown, at least one of whom is expected to be arrested in and first brought to the Southern District of New York, knowingly combined, conspired, confederated, and agreed together and with each other to launder money, in violation of Title 18, United States Code, Section 1956(a)(3)(B).

5. It was a part and an object of the conspiracy that ABDUL BASIT MOOSANI, the defendant, and others known and unknown, with the intent to conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of specified unlawful activity, to wit, illegal narcotics trafficking and money laundering, knowingly would and did conduct and attempt to conduct a financial transaction

involving property represented to be the proceeds of specified unlawful activity and property used to conduct or facilitate specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(3)(B).

(Title 18, United States Code, Sections 1956(h) and 3238.)

FORFEITURE ALLEGATION

6. As a result of committing the offenses alleged in Counts One and Two of this Indictment, ABDUL BASIT MOOSANI, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offense, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offenses.

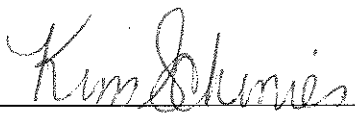
Substitute Asset Provision

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



FOREPERSON



GEOFFREY S. BERMAN
United States Attorney

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- v. -

ABDUL BASIT MOOSANI,

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INDICTMENT

S2 18 Cr.

(18 U.S.C. §§ 1956(h),
2, and 3238)

GEOFFREY S. BERMAN
United States Attorney.

A TRUE BILL


Foreperson.

ARREST WARRANT, TRUE BILL P SEAL @ INDICTMENT
MA6- RW LEHRBURGER 7/9/18 